IN THE JUSTICE COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF COCHISE, PRECINCT No. 1

STATE OF ARIZONA,) CASE NO. <u>CR2019</u> 28 .		
Plaintiff,	COMPLAINT		
vs. DOUGLAS PACKER,) JAN 18 2019		
Defendant(s).	COUNTY OF COOHISE BISSEE JUSTICE COURT PRECINCT #1		

The complainant herein, Lori Ann Zucco, Chief Criminal Deputy

County Attorney, pursuant to Rule 2.3, Rules of Criminal Procedure, on information and belief complains against:

DOUGLAS PACKER

and charge that in Justice Court Precinct No. 1

COUNT 1

On or between October 10, 2014 to January 2015, **DOUGLAS PACKER** committed sexual assault by intentionally or knowingly engaging in sexual intercourse or oral sexual contact without consent, to wit: M.M. in violation of A.R.S. §§13-1406, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 2 felony.

COUNT 2

On or between October 10, 2014 to January 2015, **DOUGLAS PACKER** committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: had a sexual encounter with M.M., in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 3

On or between October 10, 2014 to January 2015, DOUGLAS PACKER committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: exposed

himself to M.M. the first time, in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 4

On or between October 10, 2014 to January 2015, **DOUGLAS PACKER** committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: exposed himself to M.M. the second time, in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 5

On or between October 10, 2014 to January 2015, **DOUGLAS PACKER** committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: exposed himself to M.M. the third time, in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 6

On or between October 10, 2014 to January 2015, DOUGLAS PACKER committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: exposed himself to M.M. the fourth time, in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 7

On or between October 10, 2014 to January 2015, DOUGLAS PACKER committed unlawful sexual conduct by, as an employee of the Cochise County Jail, intentionally or knowingly engaged in any act of a sexual nature with an offender who was in the custody of the Cochise County Jail, to wit: exposed himself to M.M. the fifth time, in violation of A.R.S. §§13-1419, 13-1401, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 5 felony.

COUNT 8

On or between October 10, 2014 to January 2015, DOUGLAS PACKER committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: M.M. the first time, in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

COUNT 9

On or between October 10, 2014 to January 2015, DOUGLAS PACKER committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: M.M. the second time, in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

COUNT 10

On or between October 10, 2014 to January 2015, DOUGLAS PACKER committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: M.M. the third time, in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

COUNT 11

On or between October 10, 2014 to January 2015, DOUGLAS PACKER committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: M.M. the fourth time, in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802. and 13-804.01, a class 1 misdemeanor.

COUNT 10

On or between October 10, 2014 to January 2015, DOUGLAS PACKER committed indecent exposure by exposing his genitals and another person is present and the defendant is reckless about whether the other person, as a reasonable person, would be offended or alarmed by the act, to wit: M.M. the fifth time, in violation of A.R.S. §§13-1402.A, 13-1401, 13-105, 13-707, 13-802, and 13-804.01, a class 1 misdemeanor.

DATED this ____ day of January, 2019.

COCHISE COUNTY ATTORNEY

BY:

Lori Ann Zucco

Chief Criminal

Deputy County Attorney

JUSTICE COURT PRECINCT No. 1

State of Arizona v. DOUGLAS PACKER						
Check One						
☐ 48 Hour Complaint ☐ Issue Summons						
If it becomes necessary to issue a warrant for the Defendant's arrest the State						
request						
that the warrant be ACIC NCIC Requested Bond Amount \$						
Hold off issuing Summons						
☐ Issue Warrant ☐ ACIC ☐ NCIC Requested Bond Amount \$250,000						
				·		
☐ PURSUANT TO A.R.S. § 13-3961(A)(5)(a)(ii), NO BOND IS TO BE SET In custody on other charges						
Statement of Factual Basis for Issuance of Warrant:						
DEFENDANT: DOUGLAS PACKER						
Address: Cochise County Jail, Bisbee, AZ 85603						
Race: Caucasian	Sex:	Male	DOB:	05 1955		
Ht. 6'01" Eyes: Hazel	Wt:	192 lbs.	Hair:	Brown		
Lycs. Itazei	5514.		Occupation	···		
Work Address:						
Phone Number(s):						
Additional information that will assist in locating the defendant:						
Law Enforcement Agency:	ccso					
DR# 19-00430						